

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

FRONTIER AIRLINES, INC.,
Plaintiff,

v.

AMCK AVIATION HOLDINGS IRELAND LIMITED,
ACCIPITER INVESTMENT 4 LIMITED,
VERMILLION AVIATION (TWO) LIMITED,
ACCIPITER HOLDINGS DAC, CARLYLE
AVIATION MANAGEMENT LIMITED, MAVERICK
AVIATION HOLDINGS LTD., MANCHESTER
AVIATION FINANCE S.a.r.l., VERMILLION
AVIATION HOLDINGS LIMITED, WELLS FARGO
TRUST COMPANY, N.A., solely in its capacity as
OWNER TRUSTEE, and UMB BANK, N.A., solely in
its capacity as OWNER TRUSTEE,
Defendants.

22 Civ. 2943 (PAE)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law,
Defendant Vermillion Aviation Holdings Limited hereby respectfully moves this Court, before
the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New
York, for an order pursuant to Rule 12 of the Federal Rules of Civil Procedure dismissing the
Second Amended Complaint in this action and granting such further relief as the Court deems
proper and just.

Dated: November 10, 2022
New York, New York

Respectfully submitted,

s/ Jeff E. Butler

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